

## **FACT SHEET**

# DRAFT POST-CLOSURE PERMIT RENEWAL LUKE AIR FORCE BASE, BARRY M. GOLDWATER RANGE (EAST SEGMENT) MTR UNIT 8 BURIAL PIT EPA I.D. NO. AZ4570024139

This fact sheet was prepared in accordance with the Arizona Administrative Code (A.A.C.) R18-8-271.E(e) and R18-8-271.G. A fact sheet must accompany every Arizona Hazardous Waste Management Act (AHWMA) draft permit that the Arizona Department of Environmental Quality (ADEQ) has prepared that either raises major issues or involves a new facility. All references to the A.A.C. hereafter refer to the A.A.C. R18-8-260 et. seq., as amended effective September 5, 2015, as published at 21 Arizona Administrative Register (A.A.R.) 1246, which incorporates and/or modifies parts of Title 40 Code of Federal Regulations (CFR) Parts 260 et. seq.

Luke Air Force Base (LAFB) has applied for a renewal of its Permit for the Barry M. Goldwater Range (East Segment) (BGR-E) MTR Unit 8. ADEQ has drafted a renewal to the Permit for the BGR-E MTR Unit 8 (the Draft Permit), and has made the Draft Permit available for public comment. This Fact Sheet describes the BGR-E facility, summarizes the Draft Permit and provides information on how to find out more about the Draft Permit. At the end of the Fact Sheet are the procedures for public participation and the ADEQ contact information.

#### A. FACILITY DESCRIPTION

The Barry M. Goldwater Range (BGR) (see Figure 1) functions as a facility for training pilots in air-to-air and air-to-ground combat. The U.S. Air Force manages the eastern section of the BGR, which includes a munitions treatment range (MTR). The MTR is located on the northeastern portion of the BGR, within Maricopa County, approximately 12 miles southwest of the Gila Bend Air Force Auxiliary Field and 15 miles southwest of Gila Bend. The MTR was used for destruction of waste munitions and included eight former treatment units. All of the treatment units are closed. The MTR will continue to be used solely for emergency response activities and training exercises.

MTR Unit 8 is a former burial pit located in the southwest portion of the MTR. The burial pit is approximately 140 feet long by 40 feet wide by 12 feet deep and was operated between 1983 and 1989. The depth of waste in the pit is estimated to be from 2 to 10 feet. It contains ash and munitions debris resulting from the open burning of hazardous waste munitions, and includes soils with arsenic concentrations above the nonresidential soil remediation level of 10 parts per million (ppm). A cover has been installed on MTR Unit 8 which has been engineered and constructed to ensure that there is no threat to human health or the environment. The cover is comprised of the following:

- A gravel surface component (minimum thickness of 2 inches) with native vegetation to minimize erosion;
- A compacted soil component with a minimum thickness of 2 feet, the surface of which slopes 3 percent;
- A geocomposite drainage layer; and

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• A geosynthetic clay liner (GCL) with a 40-mil geomembrane backing to provide a long-term barrier to moisture infiltration into the underlying wastes.

A chain link fence has been installed around MTR Unit 8, for security purposes. This fence also serves to prevent the intrusion of burrowing animals in order to help protect the cover.

In accordance with A.A.C. R-18-8-264.A (40 CFR §264.90(b)(4)), groundwater monitoring is not required for MTR Unit 8 because of the following:

- Depth to groundwater is relatively deep (greater than 300 feet);
- No minimum Groundwater Protection Levels (GPLs) were exceeded during preclosure investigations, down to 30 feet;
- Annual rainfall is less than 5 inches per year;
- Surface water evaporation rate is approximately 50 inches per year;
- The flood potential is low;
- The entire waste area has been capped with RCRA hazardous waste cap (RCRA Subtitle C) consisting of two moisture barriers.

In addition to containing requirements for monitoring of MTR Unit 8, the permit requires the U.S. Air Force to undertake a corrective action program for the Barry M. Goldwater Range East Segment. Corrective Action is required for all existing hazardous waste management facilities. The permit requires further investigations at one Solid Waste Management Unit (SWMU), and surveys for additional SWMUs and AOCs will continue. The permit may be modified in the future if additional SWMUs or AOCs are found.

#### B. <u>HISTORY OF THE SITE</u>

Acquisition of the BGR for military aviation training purposes began in 1941, shortly before the United States entered World War II. Congress officially set aside 2.6 million acres of the BGR with the 1986 Military Lands Withdrawal Act (MLWA) and designated it the Barry M. Goldwater Air Force Range under management of the United State Air Force (USAF).

Congress extended authorization of the BGR once more and re-designated BGR management responsibilities with the 1999 MLWA. The BGR is authorized for use by the Secretaries of the Air Force and Navy for 25 years until 2024 and provides that the United States Department of Defense (DoD) may apply for an extension to that authorization should there be a continuing military need for the BGR beyond 2024.

The 1999 MLWA designates the western portion as BGR-West (Yuma Segment), consisting of 1,017,990 acres with about 186 miles of exterior perimeter, and the eastern portion of the range as BGR-East (Gila Bend Segment), consisting of a 1,651,235-acre parcel with approximately 280 miles of exterior perimeter.

The airspace over the East Segment (Gila Bend Segment) belongs to, and is controlled by, the USAF, while the West Segment (Yuma Segment) belongs to and is controlled by the United States Department of the Navy (Navy). Ground access to these segments is also



controlled by the agency controlling the overlying airspace. Control by the Navy is administered through MCAS Yuma; LAFB administers USAF control.

#### C. TYPE AND QUANTITY OF HAZARDOUS WASTES DISPOSED

MTR Unit 8 contains ash and debris resulting from the open burning of hazardous waste munitions. They include munitions casings, inert rounds and bombs, and demilitarized ordnance. MTR Unit 8 also contains soils with arsenic concentrations above the nonresidential soil remediation level of 10 parts per million (ppm). Some of these wastes may be hazardous due to their characteristics of reactivity (D003) and ignitability (D001).

#### D. DESCRIPTION OF THE DRAFT PERMIT

The Permit requires LAFB to continue to maintain the BGR-E MTR Unit 8 for up to 30 years, or until it is demonstrated that the hazardous waste is removed from the site and conditions at and surrounding the site are protective of human health and the environment. LAFB submitted its initial permit application renewal on February 11, 2016.

The draft post-closure permit renewal prepared by ADEQ consists of five parts and ten appendices. All conditions are based on the RCRA Post-Closure Permit Renewal Application and revisions dated February 11, 2016; June 13, 2016; and December 13, 2016.

<u>Permit Part I</u> contains general permit conditions. These conditions are required by Arizona Administrative Code (A.A.C.) R18-8-270.A, K, and L, as well as 40 CFR 270.30.

<u>Permit Part II</u> contains general facility conditions. These conditions are required by A.A.C. R18-8-264.A and F, and 40 CFR 264, Subparts B, C, D, and E.

<u>Permit Part III</u> contains post-closure facility conditions. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 270.32 and 264, Subparts G and H.

<u>Permit Part IV</u> contains conditions relative to possible future groundwater monitoring. This condition is based on the requirements of A.A.C. R18-8-264.A and 40 CFR 264, Subpart F.

<u>Permit Part V</u> contains conditions regarding corrective action. These conditions are authorized by A.A.C. R18-8-264.A and 40 CFR 264.101(corrective action for solid waste management units).

The permit will be in effect for 10 years. It may then be renewed as necessary to continue maintenance of the cover during the 30-year post-closure care period.

### E. <u>APPLICANT REQUESTED VARIANCES/ALTERNATIVES AND APPROVAL/DENIAL BASIS</u>

No variances have been requested by the applicant.



#### F. PROCEDURES FOR REACHING A FINAL DECISION ON THE DRAFT PERMIT

All data submitted by LAFB is available as part of an Administrative Record for the draft permit. A copy of portions of the Administrative Record, including the draft permit, may be viewed at the Gila Bend Branch Library, 202 North Euclid Avenue, Gila Bend, Arizona 85337. The library operating hours are Monday 10a.m. – 7p.m.; Tuesday – Thursday: 10 a.m. - 6 p.m.; and Friday: 10 a.m. - 5 p.m. The library is closed on Saturdays and Sundays. The full administrative record is available at the ADEQ Phoenix office at 1110 West Washington Street and may be viewed from 8:30 am to 4:30 pm, Monday – Friday (excluding state holidays). To arrange an appointment to review this record at ADEQ, contact the ADEQ Records Center at (602) 771-4380.

As required by A.A.C. R18-8-271.L and 40 CFR §124.13, all persons, including applicants, who believe any condition of the draft post-closure permit or the tentative decision to prepare and issue this draft permit is inappropriate, must raise all reasonably ascertainable issues and submit all reasonably available arguments and supporting materials by the close of the public comment period. All comments submitted during the public comment period shall discuss the appropriateness of the draft permit.

The 45-day public comment period will open on February 12, 2017, and will close on March 28, 2017. During the public comment period, any interested person may submit written comments on the draft permit. These comments and supporting materials must be delivered or postmarked by the last day of the public comment period to:

Arizona Department of Environmental Quality
Terry Baer – Manager
Hazardous Waste Unit
1110 West Washington Street
Phoenix, Arizona 85007

All written comments delivered or postmarked by the last day of the public comment period will be considered in ADEQ's final determination regarding the draft permit. After all comments have been considered, a final permit decision will be made by the Director. The applicant, each person who has submitted written or oral comments, and each person who has requested will receive a notice of this final permit decision. This notice shall include reference to procedures for appealing a decision on a permit. The final permit decision shall become effective on the date specified in the final permit notice.

At the time that the final decision is made, the Director shall also issue a response to any significant comments. The response to comments shall consider all items as specified in A.A.C. R18-8-271.O and 40 CFR §124.17. The response to comments shall be made available to the public for review. Any person who desires to be placed on the mailing list for all future permitting activities for this facility or for facilities in a specific geographic area may request so in writing at the above address, pursuant to A.A.C. R18-8-271.I (c)(1)(ix)(A) and 40 CFR §124.10 (c)(1)(ix)(A).



In addition to submitting public comment, any person may request the ADEQ Director to schedule a public hearing. Written requests for a public hearing must be submitted to ADEQ by not later than close of the comment period, **March 28, 2017**, and must state the nature of the issues proposed to be raised in the hearing. The Director will hold such a hearing if: 1) he finds, on the basis of requests, a significant degree of public interest in the Draft Permit, or 2) he finds that the hearing might clarify one or more issues involved in the permit decision, or 3) a formal written notice of opposition to the Draft Permit is received within the comment period.

If you wish to be put on a mailing list for permit activity, you can make this request to the ADEQ contact person listed above. Please bring this notice to the attention of anybody who might be interested in this matter.

#### G. PERSONS TO CONTACT FOR ADDITIONAL INFORMATION

For additional information, please contact Terry Baer Manager of the Hazardous Waste Unit of ADEQ at (602) 771-4503 or toll free at (800) 234-5677, extension 771-4503 or at the ADEQ address above.



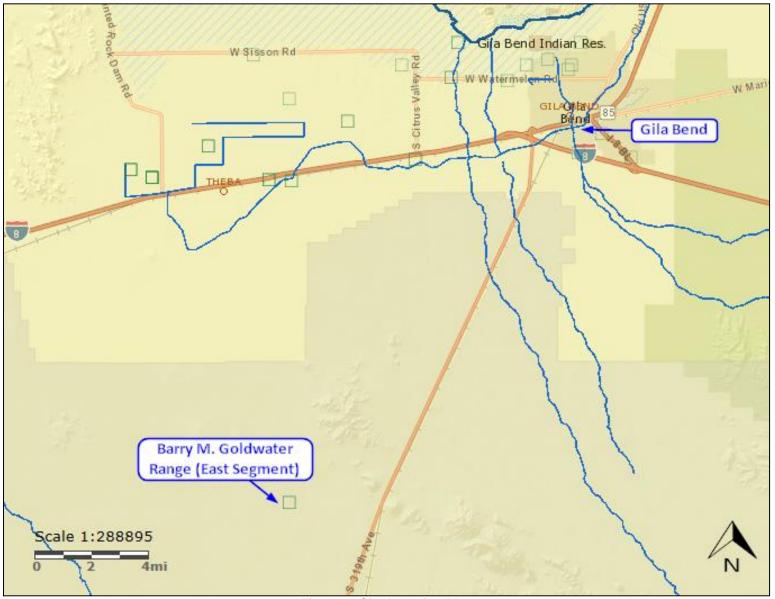


Figure 1. Site Location Map

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Figure 2. Outside MTR Unit 8



Figure 3. Inside MTR Unit 8